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5 Attorney for Plaintiff

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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA
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11 TONYA HALE,

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13 Plaintiff,

14 vs.

15 THE COSMOPOLITAN OF LAS VEGAS;
16 NV PROPERTY 1, LLC dba THE
17 COSMOPOLITAN OF LAS VEGAS, a
18 Nevada Limited Liability Company;
RICHARD SHERMAN, an individual,

19 Defendants.
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) CASE NO. 2:19-cv-00780-JCM-VCF

) STIPULATION AND ORDER CONTINUING
) THE DATE THAT PLAINTIFF MUST FILE
) THEIR RESPONSE TO DEFENDANT'S
) MOTION FOR SUMMARY JUDGMENT
) [LR 6-1; LR 6-2]

) (First Request)

22 IT IS HEREBY STIPULATED AND AGREED by and between the parties' respective
23 counsels of record pursuant to LR 6-1 and LR 6-2 that Plaintiff's response to Defendant Nevada
24 Property 1, LLC dba The Cosmopolitan of Las Vegas' motion for summary judgment filed on
25 April 12, 2021, for which the opposition is currently due on May 3, 2021, will be continued to
26 June 3, 2021. This is the first request to continue the due date for Plaintiff's response.
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1 Said continuance is being requested in order to provide Plaintiff adequate time to respond
2 to a complex dispositive motion. Delays were previously experienced due to Covid-related
3 shutdowns, health/medical issues of counsel and various witnesses, some of whom were located
4 out of state. The parties have been working as diligently as possible under the
5 circumstances. Discovery has now closed. Plaintiff's counsel, a solo practitioner, needs
6 additional time to respond to the dispositive motion while also balancing obligations in other
7 matters. Defendant does not object to the requested extension. The parties assure the Court this
8 request is not being made for the purpose of delay.
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11 LAW OFFICES OF MICHAEL P.
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JACKSON LEWIS, P.C.

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13 /s/ Michael P. Balaban, Esq.
14 Michael P. Balaban, Esq.
15 10726 Del Rudini Street
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Attorney for Plaintiff

/s/ Lisa A. McClane, Esq.
Lisa A. McClane, Esq.
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Las Vegas, NV 89101
Attorney for Defendant

16 Dated: April 28, 2021

Dated: April 28, 2021

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19 IT IS SO ORDERED:

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21 UNITED STATES DISTRICT JUDGE

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23 Dated: April 30, 2021